David E. Hawkins (VA 48367) **VINSON & ELKINS L.L.P.** The Willard Office Building 1455 Pennsylvania Ave., N.W. Washington, D.C. 20004-1008

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ATTORNEYS FOR ARCHON GROUP, L.P.

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF VIRGINIA RICHMOND DIVISION

In re:

S
Chapter 11
S
CIRCUIT CITY STORES, INC., et al.
S
Debtor.
S
Jointly Administered

MOTION FOR ADMISSION PRO HAC VICE

David E. Hawkins ("Movant"), member in good standing with the bars of the Commonwealth of Virginia, the District of Columbia, and the State of Florida, attorney admitted to practice before, among other courts, the United States District and Bankruptcy Courts for the Eastern District of Virginia, and attorney with the law firm of Vinson & Elkins L.L.P., hereby respectfully moves the Court pursuant to Local Rule 2090-1(E)(2) to enter an Order, the proposed form of which is attached hereto as **Exhibit "A."** permitting William L. Wallander and Angela B. Degeyter, attorneys and members of the law firm of Vinson & Elkins L.L.P., to practice *pro hac vice* before this Court in the above-captioned matter on behalf of Archon Group, L.P. ("Archon"). In support of this Motion, Movant states as follows:

1. William L. Wallander is a partner in the Restructuring and Reorganization group in the Dallas office of Vinson & Elkins L.L.P., and has appeared regularly before numerous bankruptcy courts throughout the United States in chapter 11 cases. Mr. Wallander is a member

in good standing of the bars of the States of Texas and New York. Mr. Wallander is admitted to practice before the United States District Courts for the Northern, Southern, Eastern, and Western Districts of Texas and the District of Arizona, and the United States Courts of Appeals for the Fifth and Tenth Circuits. Mr. Wallander received his J.D. from the University of Texas School of Law and has been practicing law since 1984. There are no disciplinary proceedings pending against Mr. Wallander.

- 2. Angela B. Degeyter is an associate in the Restructuring and Reorganization group in the Dallas office of Vinson & Elkins L.L.P. Ms. Degeyter is a member in good standing of the bars of the States of Texas and Louisiana. Ms. Degeyter is admitted to practice before the United States District Courts for the Northern and Southern Districts of Texas and the Eastern District of Louisiana. Ms. Degeyter received her J.D. from the Loyola University New Orleans School of Law and has been practicing law since 2002. There are no disciplinary proceedings pending against Ms. Degeyter.
- 3. Mr. Wallander and Ms. Degeyter understand that if they are admitted *pro hac vice* in this case, they will be subject to the disciplinary jurisdiction of this Court.
- 4. Movant requests that the Court allow Mr. Wallander and Ms. Degeyter to file pleadings and to appear and be heard at hearings and on matters in this case, in association with Movant, on behalf of Archon.
- 5. Because there are no novel issues of law presented in this Motion, Movant requests that the Court waive the requirement of Local Rule 9013-1(G) that all motions be accompanied by a written memorandum of law.
- 6. Pursuant to Local Rule 9013-1(L), because this Motion presents routine issues, Movant requests that the Court rule upon the Motion without an oral hearing.

7. Notice of this Motion has been given to (a) the parties listed on the attached service list and (b) all persons receiving electronic notice via the Court's CM/ECF system.

8. No prior request for the relief sought herein has been made to this Court in these bankruptcy cases.

WHEREFORE, Movant respectfully requests that the Court enter an Order, substantially in the form attached hereto as **Exhibit "A,"** permitting William L. Wallander and Angela B. Degeyter to appear *pro hac vice*, in association with Movant, as counsel for Archon Group, L.P.

Respectfully submitted,

VINSON & ELKINS L.L.P.

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By: <u>/s/ David E. Hawkins</u>
David E. Hawkins (VA 48367)

And

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ATTORNEYS FOR ARCHON GROUP, L.P.

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was served on December 2, 2008, (a) by the Electronic Case Filing system to the parties on the clerk's list who receive electronic notification of filings and (b) by first-class mail, postage prepaid, to the parties on the attached service list.

/s/ David E. Hawkins
One of Counsel

Dallas 1430228v.1